APPENDIX D – COMMENTS AND RESPONSES

NEPA regulations at 40 CFR 1503.1 require the lead agency to solicit public comments on a Draft Environmental Impact Statement (DEIS) prior to preparing a Final EIS. This includes Federal, State and local agencies, Native American tribes, and any persons interested in or affected by the proposed action.

The public comment period for the I-15 DEIS extended from November 23, 2007 to January 11, 2008 (49 days). The FHWA extended an extra week to the Environmental Protection Agency (EPA) and United States Army Corps of Engineers (COE). During that time, comments were invited through mail, email, through the project website, at two public hearings, and at a neighborhood meeting called by the Grandview Hill neighborhood in Provo. A total of 476 comments were received during the public comment period, in the varied formats described above.

This appendix presents every comment received during the public comment period. Many of the comments are repetitive, and so the same response may pertain to more than one comment. In same cases, sections of the EIS have been revised, in other cases readers are referred to existing text. Each comment is presented in Table D.1, at the end of this appendix. Table D.1 also refers readers to the appropriate section or text.

Federal and State agency letters and responses are in sections D.1 and D.2. City and MPO letters and responses are in Section D.3. Comments from the public are presented in Section D.4. Table D.1 presents all comments and responses.

D.1 Federal Agencies

D.1.1 U.S. Army Corps of Engineers (January 21, 2008)

Comment COE-1: The Corps concurs with the primary project purpose stated in the document, and will utilize this project statement to evaluate the project corridor under our Section 404 regulatory authority.

> Response: Comment noted.

Comment COE-2: The five secondary purposes or objectives identified in the document appear to be redundant, and, in some instances they are integral parts of the primary project purpose. Therefore, to simplify our environmental analysis the Corps will only utilize the primary project purpose statement contained in the DEIS to evaluate Section 404 regulatory issues.

> Response: The secondary purposes described in the EIS are goals that helped refine and compare alternatives, and help keep the project consistent with the MPO's and locally adopted land use plans. They were not used to screen alternatives, and do not need to be used to evaluate 404 regulatory issues.

Comment COE-3: The Corps concurs with (and appreciates) the alternatives screening process, since it eliminates all alternatives and options that don't meet the primary purpose (though they may meet one of FHWA's secondary project purposes or objectives)

> Response: Comment noted.

Comment COE-4: In the Provo/Orem area, there would not be a substantial increase in level of service (LOS) between the options with the frontage roads and the non-frontage roads options. In general, it appears that the highway segments with frontage roads (Options A and B) would only improve by one LOS versus the Option C and Option D configurations (without frontage roads). Interchanges between the frontage road options and non-frontage road options would display minimal improvements in LOS, with one exception. The Sandhill Road/University Parkway intersection would range from LOS D under Option A to LOS F under Option D. Additionally, based on the project LOS for highway segments, it appears that the proposed 800 South interchange in Orem would actually decrease LOS through the segment, (e.g. in Option A).

Response: Between the DEIS and FEIS, the traffic analysis was updated to version 6.0 of the WFRC/MAG travel model. The FEIS presents the most up-to-date traffic data available. With the new analysis, there is no difference in the mainline LOS between the options in the Provo/Orem area. The Sandhill Road & University Parkway intersection operates at LOS E in Option A and at LOS F in the other three options.

Comment COE-5: Per the last comment, in order to better understand the LOS in the Orem area and the effects of the 800 South interchange, the Corps recommends that the EIS team simulate LOS of the segments between University parkway and the proposed 800 South interchange, and between 800 South and Orem Center Street.

Response: Since publication of the DEIS, FHWA and UDOT have decided on Option D as their Preferred Alternative. Therefore, the new interchange at Orem 800 South is no longer being considered. However, during the DEIS process, the EIS Team prepared Conceptual Access Justification Reports for potential new accesses that included simulation analyses.

Comment COE-6: In comparing the LOS for American Fork Main Street - Option A with the other Options, it appears that one LOS would be gained at the intersection of 600 West and American Fork Main Street for Options B and C.

Response: Between the DEIS and FEIS, the traffic analysis was updated to version 6.0 of the WFRC/MAG travel model. The FEIS presents the most up-to-date traffic data available. With the updated analysis, this statement is still true.

Comment COE-7: The Corps is concerned about secondary wetland impacts that would result from induced growth and changes in land use around the proposed new interchanges. We are especially concerned with induced growth around the American Fork Main Street interchange. This interchange would eventually tie into the proposed East-West Connector roadway running along 10th South in Lehi. We are very concerned about the development that would occur as a result of these roadway improvements, especially in the areas currently under agricultural land use. Many of these areas contained farmed wetlands that may fall under the Corps' jurisdiction.

Response: The project by itself is not expected to cause any more growth than what is already projected by the Governor's Office of Planning and Budget, and that is incorporated in city plans and long range plans. The project may, however, affect the pace of projected growth and influence the nature of development. Many of the indirect impacts that could result from such a transportation project are a combination of social, economic influences that are independent of transportation facilities. Indirect effects are expected to be controlled by local-land-use policy as reflected in general zoning plans.

The Preferred Alternative also requires a small re-alignment of American Fork Main Street. The remainder of the project is along well-developed and long-established corridor, where minimal indirect environmental impacts can be expected.

The permitting requirements associated with Section 404(b)(1) guidelines governing the U.S. Army Corps of Engineers' permit are limited to requiring mitigation for indirect impacts that are specific and predictable in terms of location and degree. More generalized indirect impacts such as those associated with possible future growth in a region do not require mitigation by FHWA or UDOT. In the event that future development results in wetland impacts, the proponent of the development is required to mitigate those impacts.

Comment COE-8: As the team is aware, the Corps must consider other public interest review factors besides those issues pertaining to the Clean Water Act. We are concerned that the 800 South interchange would result in up to 94 housing unit relocations (per Table S-2 in the DEIS). In our permit decision, the Corps must be able to justify these potential relocations by tying them back to the project purpose. However, based on the project LOS at 800 South interchange and surrounding interchanges (i.e., the University Parkway and Orem Center Street interchanges) the 800 South interchange would not provide an appropriate increasing in LOS.

Response: Since publication of the DEIS, the FHWA and UDOT have decided on a Preferred Alternative that includes Option D in this area. This alternative entirely avoids the apartment complex that produced 77 of the residential relocations described in the DEIS.

Comment COE-9: In the affected environment, could the EIS team please explain how stormwater runoff is managed on bridges? Of particular interest are hydrocarbon runoff and de-icing runoff from the project area bridges.

> Response: As a design-build project, final designs will not be completed until after the environmental document is finished. However, UDOT will ensure that no untreated water will be allowed to enter streams or other watercourses, from bridges or elsewhere.

Comment COE-10: Adjacent is defined as neighboring, bordering or contiguous, per 33 CFR 328.3(c). Neighboring, bordering or contiguous wetlands are all included in the concept of "adjacent" wetlands per the Corps' regulation.

> Response: Section 3.14.1.1 has been simplified to reflect the appropriate use of the term.

Comment COE-11: Interchange locations need to be displayed on the wetlands figures so locations of waters of the U.S. are more readily identifiable.

> Response: Figures 3.14-1 to 3.14-4 have been revised to illustrate interchange locations and numbers. The interchange numbers can be used to find the appropriate interchange in Volume II for closer inspection.

Comment COE-12: The vast majority of wetland impacts in the common areas of Alternative 4 would occur in Category 3 wetlands (i.e. those wetlands that provide wetland functions, but that occur in highly disturbed areas).

> Response: Comment noted.

Comment COE-13: Approximately 9 acres of additional wetlands impacts would result in the construction of Provo/Orem Option A or C. Impacts throughout the Provo/Orem area would primarily occur in Category 3 wetlands.

> Response: The majority of additional impacts in the Provo/Orem area result from frontage roads and an Orem 800 South interchange. Since publication of the DEIS, the FHWA and UDOT have decided on Option D through this area, so that Preferred Alternative that avoids frontage roads, and avoids a majority of those wetland impacts.

Comment COE-14: The American Fork Main Street Interchange area contains a higher percentage of Category 2 wetlands relative to the rest of the study area. Category 2 wetlands can provide habitat for sensitive plants or animals, function at high levels for fish and wildlife habitat, and/or exhibit high ratings for functions assessed using UDOT's Wetland Functional Assessment Method (2006). The American Fork Street Main Street Interchange – Option A would have the least impact to waters of the U.S.

> Response: Since publication of the DEIS, UDOT has refined the design of Option C at the American Fork Main Street interchange because it had the highest wetland impacts. In doing so, impacts were reduced to 5.25 acres, slightly less than the 5.28 acres impacted by Option A.

Comment COE-15: The Corps has examined the waters of the U.S. within the EIS study area through our field review and subsequent verification of the delineation. We have also thoroughly examined potential impacts under the No Build Alternative (Alt 1) and the Build Alternative (Alt 4) and its various options. We have examined these wetland impacts as they relate to the primary project purpose and other social and environmental factors (mentioned in the comments below).

There are several metrics that have been used throughout this EIS to quantify the improvements to Interstate 15, including Traffic Volumes, Level of Service, Crash Analysis, etc. In the Corps' view, these metrics successfully demonstrate the need to construct the Build Alternative. After accounting for the Utah Transit Authority's FrontRunner commuter rail project, and the positive effects it will have in reducing 2030 peak-hour congestion through the project area, we realize that I-15 improvements are still necessary throughout Utah County and south Salt Lake County. We believe that expanding the existing I-15 corridor is the least environmentally damaging alternative (as opposed to designating a new corridor somewhere else through Utah Valley).

> Response: Comment noted.

Comment COE-16: The environmental document adequately supports the need for wetland impacts in the Alternative 4 common areas.

Response: Comment noted.

Comment COE-17: After accounting for impacts to waters of the U.S., housing and business relocations, and other public interest review factors in the Provo/Orem area the Corps finds that the Provo/Orem area Option D would be the least environmentally damaging, practicable alternative for the area.

Per our comments under COE-4, Options A and B would not perform much better than Options C and D. The frontage roads proposed under Options A and B would increase wetland impacts throughout the study area by over 9 acres. Though the bulk of these are disturbed Category 3 wetlands, they provide important functions and could be avoided (as configured in either Option C or D).

The interchange proposed at 800 South (Orem) would result in 77 additional housing relocations under Option C; Option D would have no housing relocations, making it the better option of the two.

Response: Since publication of the DEIS, the FHWA and UDOT have decided on Option D, with slight modifications, as part of their Preferred Alternative. It includes the following elements, in addition to widening and reconstruction in the Provo/Orem area:

- A new flyover ramp from southbound I-15 to eastbound University Parkway
- A new roundabout intersection for traffic from northbound I-15 to UVSC
- A realignment of Provo 820 North
- Total reconstruction of the Provo Center Street interchange

These plans avoid the increased wetlands impacts from the frontage roads (Options A and B) and the additional 77 residential relocations from the Orem 800 South interchange (Options A and C). Section 3.4 and Section 3.14 describe final wetland and relocation impacts from the different options.

Comment COE-18: After accounting for impacts to waters of the U.S., housing and business relocations, and other public interest review factors at the American Fork Main Street Interchange area, the Corps finds that Option A would be the least environmentally damaging, practicable alternative for the area.

Over half of the Category 2 wetlands in the I-15 study area occur in or around this interchange, and wetland impacts for Option A would be approximately 2.4 acres less than wetlands impacts under Options B or C. Per our comments under COE-6, Options B and C would not perform much better than Option A.

Additionally, Option A would have the fewest housing/business relocations and would not impact any Utah County Agricultural Protection Areas.

Response: Since publication of the DEIS, UDOT has made refinements to the design of Option C at the American Fork Main Street interchange, which minimize wetland impacts. Refinements include a slight alignment shift, additional retaining walls, and an extra lane between I-15 and 300 East. In doing so, impacts were reduced to 5.25 acres, slightly less than the 5.28 acres impacted by Option A. Option C avoids all Agricultural Protection Areas as well.

Comment COE-19: Under Alternative 4, selecting Option D in the Provo/Orem area and Option A at the American Fork Main Street Interchange would result in 42.93 acres of direct impacts to waters of the U.S. The Corps finds that these two options would constitute the least environmentally damaging, practicable alternative, after consideration of impacts to the aquatic environment and other public review factors.

Response: Since publication of the DEIS, the FHWA and UDOT have decided on Option D in the Provo/Orem as part of their Preferred Alternative. Design refinements to American Fork Option C reduce impacts below those of Option A. With these two options, the Preferred Alternative is the least environmentally damaging, practicable alternative.

D.1.2 U.S. Environmental Protection Agency (January 18, 2008)

Comment EPA-1: Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated the action alternative and options as "EC-1" (Environmental Concerns – Adequate). This "EC" rating means that impacts have been identified that should be avoided in order to fully protect the environment. The "1" rating means that no further analysis or data collection is necessary, but clarifying language or information may be necessary. As explanation of the rating criteria is enclosed.

Response: Rating noted.

Comment EPA-2: EPA has also evaluated the project "Options" to identify the Least Environmentally Damaging Preferred Alternative (LEDPA) under Section 404(b)(1) of the Clean Water Act. Our analysis of the wetland impacts from Alternative 4 (Options A, B, C and D) conclude that Options C and D are clearly the LEDPA, resulting in approximately 30% less direct wetland impacts. These wetlands impacts are primarily due to the frontage roads that are proposed for these options. In addition to higher wetland impacts, Options A and B will also have serious indirect impacts to land through the Provo and Orem area. As discussed in this DEIS, these frontage road designs will likely impact commercial businesses, thereby causing economic impacts. Implementation of Option B will likely also result in pressure to redevelop existing agricultural and low density residential lands west of the interchange to commercial uses. We do not have an environmental preference for Option C or D and defer to highway design needs and community preference for either of these two Options. However we would like to coordinate with the Utah Department of Transportation (UDOT) regarding the differences in resource impacts between Option C and D as the final preferred alternative is identified for the final EIS.

Response: Since publication of the DEIS, the FHWA and UDOT have decided on Provo/Orem Option D as their Preferred Alternative. This is the least environmentally damaging, practicable alternative.

Air Quality-1: Section 3.8.1.1 Pollutants of Concern/Criteria Air Pollutants: This section adequately explains most of the criteria pollutants related to vehicular emissions. However, there is no listing of sulfur oxides. We recommend that an additional bullet item be inserted with and explanation of SO_x emissions.

Response: A bullet item was added to discuss sulfur oxides in Section 3.8.1.1 of the FEIS includes an explanation of sulfur oxide emissions.

Air Quality-2: Section 3.8.1.3 Air Quality Attainment Status – Particulate Matter Less Than 2.5 Microns in Diameter ($PM_{2.5}$): "By December 2007, the State of Utah will make recommendations for areas to be designated attainment (meeting the standard) and non-attainment (exceeding the standard)." EPA recommends that this language be updated to address the recent publication of the Utah Area Designation Recommendation for the 2006 $PM_{2.5}$ NAAQS. This document was released on December 18, 2007 and it recommends (pg. 39) that the majority of Salt Lake County and the majority of Utah County be listed as two distinct non-attainment areas for $PM_{2.5}$.

Response: Discussion of future $PM_{2.5}$ nonattainment areas was added in Section 3.8.2.2 and Section 3.8.5.1.

Air Quality-3: Even though the I-15 Corridor has not yet been *officially* designated as a $PM_{2.5}$ non-attainment area, the DEIS does do an adequate job of explaining EPA and FHWA guidance for qualitative $PM_{2.5}$ hot-spot analysis when transportation conformity does apply for $PM_{2.5}$. However, Table 3.8.8 does indicate that there will be a 6% increase in $PM_{2.5}$ for the action alternative versus the no action alternative and no mitigation has been discussed regarding this impact. Mitigation measures for $PM_{2.5}$ caused by traffic volume increases should be discussed.

Response: Discussion of the potential increases in primary $PM_{2.5}$, as well as the implications of future reductions of NO_x emissions (the main secondary $PM_{2.5}$ precursor) was added to Section 3.8.5.1. A qualitative $PM_{2.5}$ hot-spot evaluation was also added as Section 3.8.5.4 to respond to FHWA comment. This evaluation indicates that $PM_{2.5}$ concentrations caused by vehicles emissions are expected to decrease in the future.

Air Quality-4: Section 3.8.2.1 Climate – Consider inserting a figure of windrose for the local area so that nearby residents can visualize the frequency that they are downwind from the I-15 corridor.

Response: Figure 3.8-1 Wind Rose for Salt Lake City was added as requested.

Air Quality-5: Section 3.8.4.1 – Nationwide MSAT Emission Reduction Trends: Please provide a reference for Figure 3.8-1 which shows FHWA's forecasted trends in nationwide tailpipe emissions. Additionally, consider including the Table 3.2-2 Schools and Libraries in this Section. This information would be useful in identifying sensitive populations near the highway. Future documents should include other sensitive receptors such as day care centers, hospitals and nursing homes on this list.

Response: Citation was added to the figure. A cross-reference was added to direct the reader to Section 3.2 for a discussion of sensitive receptors including schools and libraries.

Air Quality-6: EPA has significant concerns about the MSAT language use in the DEIS. Other comments from Region 8 have also reflected this position. We will schedule a meeting within the next month to facilitate further discussions regarding the EPA's position on MSATs.

Response: The EIS has been anticipating MSAT language resulting from coordination between the EPA and FHWA. That language has not yet been received. Therefore the FEIS reflects only slight changes to the MSAT discussion. If EPA/FHWA language is received by the signing of the Record of Decision (ROD), it can be included as errata in the ROD.

Water Quality-1: A project cannot further impair a Clean Water Act (CWA) 303 (d) listed water body. Utah Lake and portions of the Jordan River within the project area are 303 (d) listed waters. Where storm water discharges from the project enter into Utah Lake and portions of the Jordan River impaired for Total Dissolved Solids (TDS), it will be necessary to include additional storm water treatment measures. Without treatment, runoff from the expanded impervious surfaces (especially from winter storm events where deicer has been applied) will contribute further to the existing water quality impairments. It is noted in Section 3.12.4.2 (Surface Water Quality), that additional measures are necessary in these areas as detention will not remove dissolved solids. Removal of dissolved solids does not occur with most stormwater treatment systems, and enhanced systems employing particle destabilization (flocculation), multi-chamber treatment trains, or biological uptake may be necessary to remove dissolved solids. Since these practices have not been described, the final EIS will need to be updated with information on the type of stormwater treatment systems which will be effective in removing dissolved solids from discharges to Utah Lake and the Jordan River. In addition, the final EIS should disclose the stormwater treatments system which will ultimately be installed.

Response: Between the Draft and Final EIS, the I-15 team used the FHWA's spreadsheet for calculating Total Dissolved Solids in water run-off along the I-15 corridor under the Build Alternative. The team also calculated impacts to impaired waters and to the beneficial use classifications of 303(d)-listed waters in the study area. This work is presented in Section 3.12.4.2. Results indicate that TDS in run-off will be below water quality standards, and that the project will not further impair any impaired waters, or alter any beneficial use classifications.

The type of stormwater treatment system that will ultimately be installed as part of this project will not be determined until final roadway design. Based on the analysis presented in Section 3.12.4.2, it is expected that with the stormwater treatment system impaired waters and other waters will be adequately protected.

Water Quality-2: Please disclose the impact of ongoing (versus short-term construction) runoff from the highway into wetland areas. These indirect effects should be considered in long term project mitigation.

Response: See response to Water Quality-1, FEIS Section 3.12.4.2, and Section E.12 of Appendix E. It is expected that any run-off into wetlands will meet water quality standards. A Stormwater Pollution Prevention Plan (SWPPP) will be developed by the design-build contractor and submitted to UDEQ. The

design-build contractor will also be responsible for implementing and maintaining the BMPs contained in the SWPPP.

Indirect Effects/Quality of Life/Smart Growth-1: The analysis of indirect effects should not rely solely on compliance with existing comprehensive land use plans. While comprehensive land use plans are an important component of the analysis of indirect effects, compliance with these plans could still result in adverse environmental effects. EPA believes that without these road improvements, growth and land use would develop differently in location, density and type of development. The FEIS should identify existing conditions and general trends and forces shaping growth and development in the area; identify land with development potential and most likely locations of growth; identify sensitive environmental resources that may be impacted by such growth, direct and indirectly.

Response: In general, indirect impacts to environmental resources would be most likely to occur in areas proposed for interchanges or significant realignment. Since the 800 South Interchange has been dropped for the FEIS, the only new proposed interchange in the Preferred Alternative is the North Lehi Interchange. The Preferred Alternative also requires a short re-alignment of American Fork Main Street. The remainder of the project is along a well-developed and long-established corridor, where minimal indirect environmental impacts can be expected.

Indirect Effects/Quality of Life/Smart Growth-2: The FEIS should discuss types of mitigation techniques for environmental impacts from induced growth that could be implemented by UDOT, the Municipal Planning Organizations, or local governments. These could include:

- Access controls (location of interchanges)
- Local land use plans that affect or regulate new development
- Zoning controls
- Transfer of development rights
- Growth management regulation (public facilities ordinances, development moratoria, urban growth boundaries, extraterritorial zoning/annexation
- Resource management and preservation regulations
- Incentives for Brownfields/infill development

Response: As explained in the response to the prior comment, the project is along a well-developed and long-established corridor, where minimal indirect environmental impacts can be expected. To the extent that there could be impacts, these issues may be addressed by the cities and counties through land-use regulations and development permits based on local master plans.

Indirect Effects/Quality of Life/Smart Growth-3: Also, given the additional vehicle miles traveled in the action alternative and potential growth impacts, it would be useful to include a short discussion on realistic types of travel reduction measures that could be implemented in Salt Lake and Utah counties and a calculation of percent reduction in vehicle miles that would be possible.

Response: Chapter 2 describes a screening process that evaluated a number of technologies to help reduce traffic on I-15. Most of them did little to meet the project Purpose and Need of reducing traffic congestion. Commuter rail was a component of Alternative 4, but was evaluated in a separate document. The Utah Transit Authority is scheduled to begin construction of a commuter rail line between Salt Lake and Provo in 2008. This will help reduce vehicle miles travelled on I-15. Commuter rail was assumed in the No Build for this project, meaning that the traffic numbers presented in the FEIS assume commuter rail ridership.

Greenhouse Gases and Pollution Preservation-1: A discussion of greenhouse gasses should be included. Recent court cases suggest that EISs, even if they reduce emissions, should address this issue. Where possible, please

disclose any energy reduction efforts/technologies or other emission reduction strategies that have been, or could be considered for this project.

The Office of the Federal Environmental Executive released a new Executive Order on January 24, 2007 entitled, "Strengthening Federal Environmental, Energy, and Transportation Management" (EO 13423), which requires, among other things, that all federal agencies:

- Reduce energy intensity 30% by 2105
- Reduce Green House Gas Emissions through energy savings by 3% annually or 30% by 2105
- Build Performance: Construct or renovate buildings in accordance with sustainability strategies, including resource conservation, reduction, and use, citing; and indoor environmental quality. http://ofee.gov/eo/eo13423_main.asp

The document should address these requirements where possible.

> Response: A discussion of Greenhouse Gases and Global Climate Change, developed by the FHWA in coordination with the EPS, has been added as Section 3.19.4.7 to the Cumulative Impacts section.

D.1.3 Department of the Interior (January 29, 2008)

The Fish and Wildlife Service (FWS) has been a cooperating agency on this project and appreciates the early coordination with the Utah Department of Transportation (UDOT) and FHWA. The Department acknowledges that the upland and wetland wildlife habitat impacted by this project is in a relatively urbanized setting and that habitat quality adjacent to the existing highway is relatively low. Our recommendations are focused on helping UDOT avoid and minimize fish and wildlife-related impacts from this project, particularly in locations where there will be new impacts or there is potential for indirect impacts. We also recommend that UDOT take the opportunity to improve habitat such as: improving fish passage at stream crossings; installing bat roost structures under bridges; controlling invasive weeds replanting native species; and replacing riparian vegetation off-site if it must be removed for construction.

General Comment 1: The Department recommends that the FEIS expand the discussion of fish and wildlife resources mitigation measures (Section 2.15.4) and include specific recommendations below. We also recommend that the FEIS include a section describing the indirect effects of the project, particularly regarding the proposed new interchanges and frontage roads, on fish and wildlife resources (including wetland habitats).

> Response: Responses to specific comments are included below.

Specific Comment 1: Page 2-23, Section 2.2.1.4, Bridges - Hobble Creek is an historic spawning stream for the June Sucker and as such has been identified for stream restoration activities by the June Sucker Recovery Implementation Program (JSRIP). The JSRIP is currently involved in restoration efforts on Hobble Creek west of 1-15 and has identified the reach of the creek east of 1-15 as suitable spawning habitat for the June Sucker. We recommend UDOT consider replacing the Hobble Creek culvert with a single span bridge. This would facilitate fish passage, reduce constriction of the creek, improve wildlife habitat connectivity, allow for the passage of stream bedload and woody debris, and contribute to the restoration of this stream.

> Response: UDOT is coordinating with the Fish and Wildlife Service regarding the structure and/or other appropriate mitigation measures at Hobble Creek.

Specific Comment 2: Page 3-156, Section 3.1 2.2.5, Flooding - It appears in Figure 3.12-3 that the 1-15 corridor also crosses the 100-year floodplain for the Provo River, Dry Creek, American Fork Creek, and Hobble Creek. Permanent structures in the floodplain should be minimized, and measures identified which would mitigate for impacts to floodwater conveyance. Bridges should be single-span and avoid mid-channel support structures.

> Response: During final design of the Preferred Alternative, UDOT will undertake hydraulic modeling. These analyses will consider the final engineering of highway structures and drainage facilities across the floodplains, indicate the full extent of impact to the floodplains, and indicate appropriate drainage mitigation,

such as floodplain equalization culverts. UDOT will also comply with local floodplain ordinances and permits.

Specific Comment 3: Page 3-158 Section 3.12.2.6, Groundwater, Figure 3.12-4 - The source credited for this figure, Baskin et al., 2002, is not included by this name in the references. Instead, it is listed as "U.S. Geological Survey, 2002" on page R-xv. They are the same document. The correct link for this document is:

Response: The references have been updated.

Specific Comment 4: Page 3-168, Section 3.13.2.3, Riparian - How many acres of riparian vegetation will be removed? This question stands for the other vegetation types as well (wetland acreages are disclosed in the wetland section), but riparian habitats are the most rare and critical for fish and wildlife. We recommend a mitigation measure be included that states that riparian vegetation that must be removed will be replaced or enhanced with an equivalent acreage.

Response: The FEIS includes a calculation of impacts to riparian vegetation. It is presented in Section 3.13.2.3. The maximum amount of impact will range between 3.3 and 4.4 acres, depending on which option is chosen in the Provo/Orem Area. The Preferred Alternative would impact a maximum of 3.3 acres. The following mitigation measure was added to Section 3.13.5: Removal of riparian vegetation will be minimized, where possible. Vegetation along river corridors that are impacted by equipment or other construction activities will be replaced with a native cottonwood and willow complex.

Specific Comment 5: Page 3-169, Section 3.13.2.10, lnvasive Species - Purple loosestrife does not require perennial open water. It is typically found in a wet meadow habitat.

Response: The sentence has been re-worded as suggested.

Specific Comment 6: Page 3-171, Section 3.1 3.5, Mitigation - The landscaping plan should clearly stipulate that revegetation activities will use only natives, or non-natives that will not naturalize. Further, we recommend that landscaping plans include vegetation which is suitable and attractive for pollinating insects. We support UDOT's intention, as stated in the DEIS (page 3-211), to avoid roadside vegetation planting that would be attractive to wildlife. Page 3-1 81, Section 3.14.4.3, North Utah County - An existing Army Corps of Engineers mitigation site exists in American Fork, north of 1-15, at Mitchell Hollow Creek (immediately North of Mill Pond). This mitigation site would be impacted by the project.

Response: The following sentence was added to clarify as suggested. “UDOT will specify on I-15 construction contract documents that certified weed-free seed mixes used for landscaping and/or erosion control.” UDOT and the COE are coordinating for mitigation of all wetland impacts as part of the 404 permit. The Army Corps of Engineers mitigation site in American Fork will not be impacted by the project.

Specific Comment 7: Page 3-183, Section 3.14.4.6, Indirect Impacts - Roads can have significant impact to water quality and the biological health of streams and wetlands. Given the high groundwater table, the proximity of wetlands, and the presence of Utah Lake as a 303(d)-listed waterbody (for nutrients and total suspended solids), we recommend a more extensive discussion on water quality mitigation measures that UDOT will employ for this project. Detention basins are certainly an important component, but detention does not remove all materials (e.g., salt, nutrients, pesticides/herbicides) that affect a wetland's functional value and its value for fish and wildlife habitat. Recognizing that the final stormwater mitigation measures have yet to be selected, we recommend that the FEIS include a more complete discussion of the methods which are determined to be most appropriate.

Response: See response to EPA (Water Quality 1 and 2).

Specific Comment 8: Page 3-183, Section 3.14.4.6, Indirect Impacts - Some of the options associated with the action alternative may have indirect effects on wetlands and wildlife habitat, as indicated in Section 3.1.2.4. For example, the frontage road options (Options A and B) through Provo & Orem would likely facilitate new development west of I-15 (e.g., at the new access at 2000 South). Another example, Option B of the American Fork Main Street exit,

"would likely result in pressure to redevelop existing agricultural and low density residential lands west of the interchange to commercial uses" (page 3-5). It is not clear from the DEIS what the current level of access is in these areas, what the current development plans are, and to what extent development in these areas will be facilitated by the new interchanges/frontage roads associated with this project. The FEIS should include an evaluation of the indirect impacts of this change in land use on fish and wildlife resources, including wetland habitats. The wildlife section at this time has no evaluation of indirect impacts and the wetlands section does not address this issue.

Response: The Preferred Alternative does not include the frontage roads. With regard to the rest of the comment, see response to EPA (Indirect Affects/Quality of Life/Smart Growth-1).

Specific Comment 9: Page 3-188, Table 3.15-1 - As of December 6, 2007, slender moonwort *(Botrychium lineare)* has been removed as a Candidate for listing under the Endangered Species Act.

Response: Slender moonwort has been removed from Table 3.15-1.

Specific Comment 10: Page 3-200, Section 3.15.2.2, Focused Special-Status Species Surveys - The DEIS states (lines 2-3) that all the potential Ute ladies'-tresses habitat sites were surveyed on eight days in 2006 but only one day, in 2007. Two years of surveys of each site is standard FWS protocol for this species. There is likely a good explanation for the difference, and clarification in the FEIS (as well as the Section 7 consultation) would be helpful.

Response: Section 3.15.2.2 was updated with the following information: Per letter from Ron Kass (dated September 25, 2007), Ute ladies'-tresses inventory was conducted during the last three weeks of August 2007. The inventory included visiting all potential orchid sites within the project study area provided by the wetland maps (at that time). No Ute ladies'-tresses were observed.

Follow up surveys are recommended for sites that have high potential occurrence. The following mitigation measure was added to Section 3.15.4: Coordinate with FWS prior to construction to determine if updated presence/absence surveys of Ute ladies'-tresses and additional Section 7 (of the Endangered Species Act) consultation may be warranted.

Specific Comment 11: Page 3-202, Section 3.15.2.3, River & Stream Riparian Habitat, Spanish Fork River – The June Sucker is not considered extirpated (line 19) from the Spanish Fork River. Individuals have been found in this river during spawning season in recent years. Also, hybrid June-Utah Suckers have been found in Spring Creek.

Response: The portion of the sentence stating that the June Sucker has been extirpated from the Spanish Fork drainage basin has been deleted. The sentence now reads: The Spanish Fork River historically contained spawning habitat for June Suckers and individuals have been found in this river during spawning season in recent years.

Specific Comment 12: Page 3-211 .3, Section 3.15.3, Impacts on Wildlife and Wildlife Habitats – Wildlife mitigation actions for the proposed project are listed as bullets. The public would benefit from a brief discussion of the proposed mitigation actions supported by any relevant studies, and how these are expected to minimize impacts on wildlife.

Response: Section 3.15.4 has been revised to include a discussion on how the BMP is expected to minimize impacts on wildlife.

Specific Comment 13: Page 3-211, Section 3.15.4, Mitigation - The DEIS states (lines 18-19) that preconstruction field surveys will be conducted to determine if the proposed build alternative could disturb active nests of migratory bird species, but does not state what action UDOT would take if there were active nests discovered in these surveys. We recommend the following measures to avoid impacts to migratory birds and to avoid potential construction delays:

- Time tree and shrub removal to occur during the non-nesting season (approximately September 1 -April 30). If this is not possible, conduct preconstruction surveys to determine whether active nests are present; active nests found the area should be left untouched until the young have fledged.

- Raptor nests within the range of disturbance of project activities (refer to the FWS Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances [2002]) will be surveyed prior to construction activity if the construction will occur during the nesting season. We recommend identifying nests prior to trees leafing out and surveying again after nesting has begun to determine which nests are active, and what species are utilizing them. If an active raptor nest is identified, UDOT will coordinate with FWS and/or UDWR to determine appropriate buffer distances and duration given the species and nest location.
- Reconstruction of existing bridges will be avoided during nesting season (approximately May - July) to avoid take of swallows. If bridge reconstruction must occur during this period, existing nests must be removed prior to nesting occurring, and deterrence devices (tarps, netting, or other methods such as Bird-X gel) should be employed to deter nesting.

  Response: The suggested mitigation measures have been incorporated into Section 3.15.4.

Specific Comment 14: Page 3-211, Section 3.15.4, Mitigation - It is unclear why more preconstruction field surveys for Ute ladies'-tresses would be necessary (lines 20-21), given surveys have already been conducted, unless the construction is not funded and undertaken for many years in the future. We recommend that you coordinate with FWS at that time to determine if updated surveys may be warranted.

Response: The mitigation measure now reads: Coordinate with FWS prior to construction to determine if updated presence/absence surveys of Ute ladies'-tresses and additional Section 7 (of the Endangered Species Act) consultation may be warranted.

Specific Comment 15: Page 3-211, Section 3.1 5.4, Mitigation - As riparian habitats are rare and valuable for wildlife, we recommend UDOT commit to avoiding removal of riparian vegetation, including willow and cottonwood, where possible and mitigating for riparian vegetation that must be removed by replacing or enhancing with an equivalent riparian acreage.

Response: The following mitigation measures were added:

- Minimize removal of riparian vegetation, where possible. Replace vegetation along river corridors that are impacted by equipment or other construction activities with native riparian vegetation. Native riparian vegetation cuttings will be used, where appropriate, for revegetation rather than containerized stock.

Specific Comment 16: Page 3-211, Section 3.15.4, Mitigation - We recommend that avoidance and minimization measures and best management practices (including those developed in cooperation with` the Utah Division of Wildlife Resources) be more fully described in this section.

Response: Section 3.15.4 has been revised to include updated mitigation commitments.

Specific Comment 17: Page 3-211, Section 3.15.4, Mitigation - Many bat species utilize bridges and culverts, particularly as natural roost structures are diminishing. We recommend UDOT consider opportunities to promote and encourage bat roosts under bridges (particularly over waterways) as a low-cost means of benefiting wildlife. The Utah Division of Wildlife Resources may also be helpful in this conservation effort.

Response: UDOT will coordinate with USFWS and the Utah Division of Wildlife Resources regarding bat roosts under I-15 bridges.

Specific Comment 18: We have found several Land and Water Conservation Fund (L&WCF) sites that could be impacted by this project. They are:

- 49-00335B-Smith Fields Park
- 49-003351- Utah Lake State Park
- 49-00360- Meadows Park

We recommend consultation with the official who administers the L&WCF Program in Utah to determine any potential conflicts with Section 6(f)(3) of the L&WCF Act (Public Law 88-578, as amended). This sections states: "No property acquired or developed with assistance under this section shall, without the approval of the Secretary [of the Interior], be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location."

Response: Section 4.7 of the FEIS has been updated with the following paragraph:

On February 12, 2008 the Grants Coordinator for the UDNR Division of Parks and Recreation was contacted in response to a comment received during the public comment period for the DEIS. The comment stated that three additional parks may be impacted by this project: Smith Fields Park, Utah Lake State Park, and Meadows Park. Discussion with the Grants Coordinator established that Santaquin Meadows Park, is located in Santaquin at 400 East 610 South, approximately 4.64 miles southeast of the South Payson interchange, the southern terminus of the project. More investigation determined that Smith Fields Park is located in Draper, approximately 0.29 miles east of I-15 and Utah Lake State Park is located in Provo, approximately 2 miles west of I-15, both outside the project study area. Based on this consultation, it was confirmed that no conversion of Section 6(f) properties will occur as a result of this project.

Specific Comment 19: Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. We acknowledge that you have consulted with the Utah State Historic Preservation Office, and will be preparing a Memorandum of Agreement to minimize adverse effects to historic properties if needed.

Response: Comment noted.

D.1. 4 June Sucker Recovery Program (DOI) (January 11, 2008)

Subject: Draft Environmental Impact Statement (DEIS), I-15 Corridor Utah County to Salt Lake County, (FHWA-UT-EIS-07-01-D); Project No. IM-NH-15-6(149)245E) Dear Mr. Machado: We have reviewed the subject DEIS and offer the following comment under the authority of the National Environmental Policy Act (42 USC 4332 (2) (c) (NEPA). As a Participating Partner in the June Sucker Recovery Implementation Program (JSRIP) our comments are focused on the evaluation of the impacts of the proposed project on the survival and recovery of the endangered June Sucker (*Chamistes liorus*) which exists naturally only in Utah Lake and currently is known to spawn in the Provo River.

In addition, our office is the lead agency for preparation of NEPA compliance documentation for plans by the JSRIP to restore aquatic and physical habitats in Hobble Creek (Springville, Utah County), a potential spawning tributary, to benefit the June Sucker. We recently completed the public scoping process for the project where we invited public comment on our conceptual restoration plans. UDOT has been invited to participate. For your information our concept for Hobble Creek habitat restoration are in the enclosure, which is presented at our scoping meeting.

Comment 1: Our goal is to re-establish June Sucker spawning in Hobble Creek as a necessary recovery action for the species. Your DEIS acknowledges that Hobble Creek may have been an historic June Sucker spawning stream. At present, Hobble Creek crosses I-15 through a culvert just south of the North Springville Exit (No. 261). The freeway is planned to expand to 4 general purpose traffic lanes plus an express lane, in each direction, for a total of 10 lanes at this location.

As you will note in the enclosure, we propose to improve the lowest reach of Hobble Creek from its Utah Lake terminus eastward to I-15. Our studies indicate that suitable spawning habitat exists in Hobble Creek east of I-15 which increases the importance of our Hobble Creek restoration plans. In part, our restoration project will facilitate

access by June Sucker for Utah Lake of these valuable spawning reaches. Our goal for Hobble Creek would be materially enhanced if FHWA/UDOT would consider replacing the existing Hobble Creek culvert through I-15 with an open-span bridge as part of the I-15 expansion. An open-span bridge would eliminate the existing culvert which potentially blocks fish passage and would allow a more natural Hobble Creek to reestablish in a manner favorable to June Sucker. We would appreciate the opportunity to discuss this issue with you further.

Response: UDOT is coordinating with the Fish and Wildlife Service regarding the structure and/or other appropriate mitigation measures at Hobble Creek.

Comment 2: Meanwhile, we have reviewed the pertinent sections of the DEIS that address the endangered June Sucker and we note that no direct impacts to the species are predicted (Table 3.15-2). We generally concur that the I-15 expansion as planned should not directly impact habitat of the June Sucker in Utah Lake, or the Provo River.

The potential for indirect impacts to the species is, however, indicated in the Table 3.15-2. However, we find no discussion of indirect impacts on fish and wildlife species, particularly the June Sucker, in the text of the DEIS. We recommend that indirect impacts be discussed in detail in section 3.15.3.2 in the final EIS.

We assume that indirect impacts could mean impacts during the construction of various bridge expansions, particularly over the Provo River. While Best Management Practices (BMPs) for bridge construction are mentioned in 3.15.3.2., they are not listed in the DEIS. We are confident FHWA/UDOT are very experienced in avoiding adverse impacts to water bodies during bridge construction and undoubtedly have developed advanced practices for such work. BMPs applicable to I-15 need to be included in the Final EIS.

Response: The direct/indirect impacts discussion is located in Section 3.15.3.2. The following indirect impacts were added to the section: Construction of I-15 may increase distribution and spread of noxious weeds and other invasive plants into adjacent native vegetation communities thereby reducing overall wildlife habitat quality. However, implementation of mitigation measures identified in Section 3.13.5 would ensure that construction activities would not introduce or spread invasive species in the study area. Temporary indirect effects, such as habitat modification due to sedimentation, also have potential to occur during construction. If it is necessary to encroach on stream channels (including side channels), the placement of temporary cofferdams could temporarily increase sedimentation. BMPs applicable to bridge construction for I-15 have been added.

Comment 3: In order to minimize adverse indirect impacts on the endangered June Sucker, we recommend the following BMPs be adopted for bridge expansion work associated with this project:

- Bridge abutments should be constructed on uplands without need for encroachments into the stream channel (including side channels). Bridge should span the entire channel width without need for support in mid-channel. Avoid any blockage or construction activities in the active stream channels.
- If necessary to encroach on stream channels (including side channels), temporary cofferdams should be constructed to enclose construction activities to prevent escape of polluting sediment, oils, etc.
- Temporary silt fencing should be installed alongside channels, both up and downstream from construction sites, to prevent runoff of any sediment, construction water, cement and other pollutants into the stream channel, including side channels.
- If possible, confine construction activities to the August to March time period. We realize that this may not be possible with a project of this scope. However, these months are outside the spawning period of June Sucker in the Provo River, or other rivers, and would largely avoid any potential for adverse impacts on June Sucker in Utah Lake tributaries.

Response: The suggested BMPs were added to Section 3.15.4

Comment 4: Our feasibility studies (June Sucker Recovery Implementation Program, 2002 – Feasibility analysis of establishing an additional spawning location to benefit the endangered June Sucker, prepared by Bio-West, July 2002. 71pp+App) completed in 2002, recommended four Utah Lake tributaries for further consideration for habitat

restoration to benefit June Sucker (see enclosure). Two of these – American Fork River and Spanish Fork River – will be subject to bridge expansions associated with I-15. While our program continues to evaluate possible June Sucker use of these rivers, we are currently focused on Hobble Creek and have no plans at the present time to implement habitat improvements in these tributaries. Nevertheless, we recommend these other rivers be protected from adverse project impacts to the maximum extent possible during I-15 expansion by adopting the construction consideration listed above.

Response: Comment noted. UDOT/FHWA will keep this in consideration.

Comment 5: We note in the Table of Contents that Mitigation measures for wildlife impacts appear on page 3-211. However, we cannot find this page in the PDF version of the DEIS on your website. Please ensure that mitigation measures for fish and wildlife are clearly displayed in the Final EIS. For emphasis, we recommend that an appendix, or other separate section, be prepared that specifies all environmental and mitigation commitments that UDOT/FHWA intends to implement for this project.

Response: Additional mitigation measures have been added to Section 3.15.4. All commitments can be found in Appendix E.

Comment 6: We also note that UDOT/FHWA is preparing a Biological Assessment (BA), pursuant to the Federal Endangered Species Act, that will focus on project impacts to endangered and threatened species. While the DEIS contains generally adequate information on the June Sucker, the BA should describe and evaluate, in detail, the habitat, species biology an expected project impacts on all listed species, including the June Sucker. We request the opportunity to review and comment on the Biological Assessment when it is complete.

Response: The BA will be provided to FWS for review and comment.

In closing, you will note from our enclosure that one of our project purposes is to offer opportunities to partner agencies to provide other public benefit consistent with our need to facilitate June Sucker spawning in Hobble Creek. These might include offsetting environmental mitigation requirements. We would be willing to discuss such opportunities with FHWA/UDOT.

Thank you for your consideration of these comments.

D.2 State agencies

D.2.1 Utah Transit Authority (January 11, 2008)

UTA/ UDOT structure and crossing coordination will be essential to the I-15 project where it crosses the future segments of Frontrunner as well as other railroad property owned by UTA including the former UPRR Tintic Industrial Lead and former UPRR Provo Industrial Lead. Roadway designs for the I-15 corridor should protect and preserve these railroad corridors including but not limited to the existing corridor widths and minimum envelope heights for future planned rail transit operations. UTA foresees that extensive coordination efforts will be required to ensure roadway design solutions that provide for placement of structural elements and crossing devices that are adequate for planned future rail transit operations. UTA anticipates high levels of coordination at the following crossing locations of I-15 and UTA owned rail rights-of-way:

- North Payson Interchange ~Station 580
- SR-164 Benjamin Interchange ~Station 705
- 7300 South Overpass ~Station 765
- Tintic Industrial Lead Overpass ~Station 825
- 400 North Overpass ~Station 850
- Spanish Fork Main Street ~Station 910
- I-15/Railroad Overpass ~Station 945

Response: UDOT will continue coordination with UTA on these issues.

Specific Comments

Comment 1: Options A and C of the American Fork Main Street Interchange as shown in this document would require users of the American Fork FrontRunner Station (as shown in UTA's FESR) to travel out of direction by distances ranging from 1.6 to over 3 miles.

- Option A is the least desirable for efficient access to the planned UTA FrontRunner Commuter Rail Station. This option maintains both the current alignment of American Main Street west of I-15 as well as the existing at-grade crossing the 7350 West (American Fork). With future residential development in the area and additional vehicular traffic along 1000 South (Lehi)/200 South (American Fork) from proposed improvements to that road, the at-grade crossing at 7350 West (American Fork) would be inadequate to handle the average daily traffic volumes.
- Option B as shown in this document represents the original design that was proposed by UTA and UDOT early in the I-15 EIS process. While this option is still UTA's preferred option because it represents the shortest driving distance from I-15 to the planned station location , UTA also recognizes that since the establishment of this option, environmental impacts have been identified related to agriculturally protected lands that have forced UDOT to consider other options. Option B as it is shown in this document also introduces an additional at-grade crossing to accommodate a connection between traffic moving between 1000 South (Lehi)/200 South (American Fork) and American Fork Main Street west of I-15. In order to have new at-grade crossings approved by UPRR and UTA the applicant for the closing typically is required to identify at least two existing at-grade crossings in relative close proximity to the proposed new crossing that can be permanently closed. This document has not indicated which existing crossings UDOT and FHWA intended to close in order to receive approval for the new crossing.
- Option C as shown in this document has the longest out of direction travel for rail commuters driving to the planned station from I-15. However, UTA is aware that that there are two other separate ongoing UDOT environmental and design studies. One is the 1000 South (Lehi)/200 South (American Fork) widening from the interchange to Redwood Road in the west. The other project is the Vineyard Connector which is proposed to provide an arterial connection from Vineyard (the former Geneva Steel site) to the newly widened 1000 South/200 South. UTA staff has seen preliminary designs for the Vineyard Connector north of 1000 South/200 South that would provide a grade separated crossing of the UPRR/UTA tracks and ultimately connect to the American Fork Main Street Interchange Option 'C'. In light of these ongoing projects and potential designs, UTA would support Option 'C' as shown in this document. Again, extensive coordination efforts will be required to ensure roadway design solutions provide for placement of roadway structural elements and rail crossing devices that are adequate for planned future rail transit operations.

  Response: UTA's support for Option C is noted. Option C is part of the Preferred Alternative in this area. UDOT will coordinate with UTA as the design progresses to provide for placement of roadway structural elements and rail crossing devices that are adequate for planned future rail transit operations.

Comment 2: Page 2-15, Alternative 4: I-15 Widening and Reconstruction, plus CRT- Please update to reflect the information included in the Provo to Salt Lake FrontRunner FESR. UTA's Current plan for operating schedule incorporated in UTA's FESR has FrontRunner trains operating every 15 minutes during the a.m. and p.m. peak hours (in peak direction), every 30 minutes during off-peak hours during the day, and every 60 minutes during the evening hours (7 p.m. to 11 p.m.) with hourly Saturday service.

Response: The operation schedule above has been added to the cited section.

Comment 3: The former UPRR Provo Industrial Lead railroad property currently extends from Salt Lake County into Utah County across the Point of the Mountain on the east side of the existing I-15 corridor. This railroad property is

not labeled in the DEIS as UTA property. Please label throughout including where it crosses under the I-15 alignment at station 2190 and 2105 as "UTA Owned Property".

Response: Comment noted, and the correction has been made.

Comment 4: The former UPRR Provo Industrial Lead property in the south Draper and northern Lehi area that will be potentially impacted by the I-15 project (approximately stations 2480 to 2410) was originally land grant property and was originally 200 feet in width (100 feet on either side of the existing rail centerline). Some of the potentially impacted property was purchased from UPRR for the original construction of I-15 in the 1960's. This transaction took place prior to UTA ownership. UTA uses UPRR valuation map data to indicate current ownership and land representing the property that was sold to UTA. The I-15 DEIS document says that the property information is unavailable for a portion of this area. UTA requests that UDOT coordinate with UTA to develop cooperative design resolutions and use the valuation maps to understand the property designations through this section of the study area.

Response: UDOT will coordinate with UTA to gather ownership information and to develop design solutions through this highly constrained section of the I-15 project corridor.

Comment 5: Former UPRR Provo Industrial Lead in northern Lehi crosses under the I-15 alignment in two locations within the limits of the I-15 project. Please coordinate with UTA to find design solutions that ensure roadway design solutions provide for the placement of structural elements and crossing devices that are adequate for future planned rail transit operations.

Response: UDOT will coordinate with UTA as the design progresses to ensure roadway design solutions provide for placement of roadway structural elements and rail crossing devices are adequate for planned future rail transit operations.

Comment 6: The drawings that show the tie-in of the new alignment of Minuteman drive to Highland Drive at 14600 South appear to illustrate a misalignment with UTA's double track structure on Highland Drive. Please adjust this design and coordinate with UTA to find design solutions that are adequate for future planned rail transit operations.

Response: Design has been adjusted so that the existing structure will not be impacted by the proposed design concept.

Comment 7: The proposed crossing structures at I-15 at approximate stations 2190 and 2105 will require UTA coordination to ensure design resolutions that protect and preserve existing corridor widths and minimum envelope heights for rail future planned rail transit operations.

Response: UDOT will coordinate with UTA as the design progresses to ensure roadway design solutions provide for placement of roadway structural elements and rail crossing devices are adequate for planned future rail transit operations.

Comment 8: The alignment of the proposed 800 South Interchange in Orem is located in close proximity to the planned Orem Intermodal Center. The Orem Intermodal Center is expected to serve the Provo to Salt Lake FrontRunner Commuter Rail, the Provo/Orem Bus Rapid Transit line, local bus service as well as park and ride capacity. The Intermodal Center as it has been proposed in UTA's Provo to Salt Lake FrontRunner FESR is intended to support dense mixed-use and transit oriented development. UTA is currently engaged in negotiations with Orem City and Utah State University to buy land for the development of the Intermodal Center. UTA feels that with inclusion of the access road (immediately west of the proposed railroad viaduct) the proposed 800 South Interchange serves the planned Intermodal site very well. The interchange provides UTA with additional access to the UVSU campus for the UTA vehicles that will be required with the students, faculty and staff that will be arriving at the Intermodal Center. As the UTA staff looked at the proposed alignment of the 800 South Interchange they noticed that the alignment required partial land takings of a few residences along 800 South (east of Geneva Road and immediately north of the alignment). As UDOT begins to prepare the final design and property acquisition for this particular interchange, UTA

would appreciate the opportunity to coordinate with UDOT to find design solutions that may provide for the placement of structural elements that are adequate for future planned rail transit operations as well as any potential transit oriented development opportunities.

> Response: The Preferred Alternative does not include an 800 South Interchange. UDOT will coordinate with UTA as the design progresses to ensure roadway design solutions provide for placement of roadway structural elements and rail crossing devices are adequate for planned future rail transit operations.

D.3 Cities

D.3.1 Lindon City (January 7, 2008)

General Comment: Lindon City is grateful for the efforts that have been made towards this project. We understand the need for the widening of the freeway - and desire to be a willing participant in the planning, design, and construction phases of the widening project.

Upon review of the document we found that the 'All American Gymnastics' building located at 95 South 1400 West (Western Coil Rd) - (but the road is identified incorrectly on the attached map as "100 South") is not identified as a taking - and does not show up on your air photos. The project shows this lot and another vacant lot as future detention basins. (Parcels numbers 29 and 165 on the tables provided in your EIS). Note that the maps also have some of the Lindon roads mislabeled.

Please note this mistake for parcel #165 as it is not a vacant parcel. If constructed as shown, there is a complete taking of a two-year old commercial building that now houses the All American Gymnastics building.

> Response: The drawings have been updated to reflect the correct street names and the new "All American Gymnastics" building. The design has been updated to remove the proposed detention basin from the previously vacant parcel, thereby avoiding the All American Gymnastics building. UDOT will coordinate with Lindon City during the design process to stay informed as changes are made along the project corridor.

Of additional notice and concern are the following issues:

Comment 1: Landscaping of off-ramps: Lindon had previously invested a large amount of money and interest in the landscaping around the PG/Lindon off ramp. The proposed construction shows that it will eliminate much of this landscaping on the four corners of the off-ramp. The City desires to know if the landscaping will be replaced or repaired as much as possible under this project? Will landscaping of the 1600 North exit also occur? If there are no plans to landscape the off-ramps after construction, how can Lindon (and potentially Pleasant Grove and Orem) participate with UDOT to see that the off-ramps are re-landscaped (or newly landscaped) in a similar fashion?

> Response: Landscaping strategies will be developed as the design progresses. UDOT will coordinate with Lindon and other stakeholders as landscaping plans are developed.

Comment 2: Lindon Heritage Trail under-crossing: The City currently has plans for the Lindon Heritage Trail to cross Geneva Road and then turn south along Geneva Rd to cross under the freeway and then head out towards Utah Lake. The City has purchased right-of-way on the west side of the freeway leading up to the overpass - and has a majority of the needed right-of-way on the east side of the freeway. It is critical for the trail project to ensure that the bridge structure for the I-15 crossing of Geneva Road is sufficiently widened to accommodate the trail under-crossing needs. The current proposal for the trail route will take it on the west side of the railroad tracks and under the freeway on the western most portion of the bridge structure.

We would be happy to have you meet with our project engineers to discuss this trail crossing need - but want to make sure it is on the record for the widening project so that the structure will consist of adequate width and design to accommodate the future trail crossing. Please contact us on this specific design issue.

Response: UDOT will coordinate with Lindon City and UTA to provide for the proposed Lindon Heritage Trail crossing at Geneva Road and I-15.

Comment 3: Pedestrian improvements at over-pass crossings: The City is interested to know if pedestrian accommodations (sidewalks or other) are being incorporated in the reconstructed over-passes at 200 South and 2000 West. The over-passes are currently very narrow and are not wide enough for safe pedestrian crossing in either direction. Please inform us of any proposed pedestrian improvements on the 200 South and 2000 West crossings - or if no improvements are planned, how they could be added to the project.

Response: Sidewalks are included in all proposed new crossings over or under I-15. Structures will be built to accommodate cross-sections as identified in the cities' proposed long range plans.

Thank you for your time and attention to these issues.

D.3.2 Saratoga Springs (January 8, 2008)

The City of Saratoga Springs recognizes the need for north/south mobility along the I-15 Corridor. Current residents of this area, and specifically of Saratoga Springs, anticipate the widening and reconstruction of the I-15 Corridor. This project will contribute to improving the congestion on existing roadways and assist in handling future transportation needs and growth in the region. This purpose of this letter is to outline the main points of the City's position on the Environmental Impact Statement (EIS) for the I-15 Corridor.

Comment 1: The No Build alternative is required to be evaluated as an alternative in the EIS and is also used as a basis for comparing the proposed build alternatives. The City has the following comments with regard to this alternative:

A. Saratoga Springs is not in favor of this alternative. If nothing is done to the I-15 Corridor, the future transportation needs and growth in the region will not appropriately addressed.

   Response: Comment noted

Comment 2: The I-15 Widening & Reconstruction alternative includes the widening of I-15; total reconstruction of 15 interchanges, including three options fro the American Fork Main Street interchange; modification and improvements to seven interchanges; construction of one new interchange (North Lehi); and four different options in the Provo and Orem section of the I-15 Corridor that includes on potential new interchange (Orem 800 South) and a four-mile frontage road system. This proposal includes improvements to approximately 43 miles of I-15 in Utah and Salt Lake Counties. The project's southern terminus is the South Payson I-15 interchange in the City of Payson; its northern terminus is the 12300 South I-15 interchange in the City of Draper.

The City has the following comments with regard to the American Fork Main Street Interchanges:

A. The City is in favor of this interchange, as well as the I-15 Widening & Reconstruction alternative as it is an address future transportation and growth with the region.

   Response: Comment noted

B. The City is in support of the East-West Connector and the 2009-2011 timeline for construction and completion of this important corridor. The City is also in support of the 2011 commencement for improvement to the I-15 Corridor, as this allow for completion of the East-West Connector.

   Response: Comment noted. The comment regarding the East-West Connector has been forwarded to their team.

C. The proposed East-West Connector is vital to the current and future transportation needs of Saratoga Springs. The American Fork Main Street interchange is the last piece to this important corridor.

   Response: This comment has been passed along to the East-West Connector team.

Thank you for the opportunity to review and comment on the EIS for this important transportation corridor. The City anxiously anticipates the completion of these important roadways and the positive impacts they will have on the community and region. Please feel free to contact the City with questions on this letter, or for assistance on any other matter. Sincerely, Timothy L. Parker Mayor, City of Saratoga Springs

D.3.3 Payson City (January 2, 2008)

Dear Mr. Machado, Payson City has received a copy of the subject study and appreciates the opportunity to review and comment on the document. After review of the document, we concur with the proposed I-15 widening through Payson City and the improvements to the South Payson Interchange Exit 248. However, we have serious concerns about the proposed improvements for the North Payson Interchange Exit 250. As you are aware, most cities in Utah, and particularly cities the size of Payson, struggle to meet the financial demands required to maintain and operate the city. We rely heavily on the tax base that is generated from retail sales. Freeway interchanges are ideal locations for retail businesses because of visibility, accessibility to the traveling public. And the associated high traffic volumes. Because these interchanges are so valuable for retail businesses the accessibility must be such that motorists will not be unduly delayed or burdened in accessing them. Payson City feels that as proposed the improvements to the North Payson Interchange will significantly hamper the economic viability of the area because of the following reasons:

Comment 1: Impacts to existing businesses are very significant. There are four businesses that would be totally eliminated with this proposal; the Chevron Gas Station, Subway, Calvin Blohm Insurance Agency, and Payson Diesel. Four other businesses will have their existing access reduced or eliminated; Payson Market, McDonalds, Rite-Aid, and Comfort Inn. Access to the Flying J Fuel and Truck Stop will be much more difficult to reach by truckers and most likely will result in closure of the business. Tax revenue provided to Payson City from these businesses last year was nearly $82,000.

Response: Comment noted. Please see comment response 4 below.

Comment 2: With the freeway at ground level and Main Street elevated over the freeway, accessing businesses cannot occur until the motorist have traveled a considerable distance off the interchange, then down the elevated portion of Main Street both on the south and north sides of I-15. This greatly reduces the viability of the existing businesses as discussed in paragraph 1 but also limits future businesses from locating on the vacant parcels surrounding the interchange.

Response: Comment noted. Please see comment response 4 below

Comment 3: Payson City has planned and recently improved 600 North street as a major east/west collector for traffic. As proposed, the connection of Main street back into the original alignment is south of 600 north and will not facilitate using 600 North as a major collector street.

Response: The connection between 600 North and Payson Main Street has been illustrated in the Volume II plan sheets.

Comment 4: These concerns are not new and have been expressed to the DIES team as they have met with Payson City Development Staff on at least two different occasions. It is our request that additional design scenarios be created for review that will facilitate both traffic and economic development for the North Payson Interchange. We feel that the freeway interchange should be designed with the freeway elevated over Main Street to facilitate accessibility to businesses. We would hope that you would be mindful of our concerns and work to provide a solution that is acceptable to all parties involved. If you would like to discuss our concerns further, please contact Rich Nelson, City Manager at (801) 465-5207. Sincerely, Burtis Bills, Mayor

Response: The I-15 team has met with Payson City throughout the development of an interchange design. After the public comment period, the I-15 team met with Payson City officials. The I-15 team is currently

studying refinements of the location of interchange components and their potential impacts. UDOT will continue to work with Payson City and the affected businesses on the interchange configuration.

D.3.4 Draper City (December 12, 2007)

To Whom It May Concern, The Draper City Parks, Trails, and Recreation Committee appreciates the opportunity to review and comment on the draft Environmental Impact Study for the I-15 Corridor. The Draper City parks, Trails, and Recreation Master Plan identifies a proposed multi-use trail crossing of I-15 in the vicinity of the 14600 South Interchange, a bike lane on 14600 South and the east frontage road, and a multi-use trail parallel to the UTA railroad right of way and east frontage road as the Point of the Mountain. All three facilities are of regional significance. The proposed multi-use trail crossing of I-15 will connect the existing Porter Rockwell Trail in Draper with the Jordan River Parkway in Bluffdale. It will also serve as a connector trail between the existing Bonneville Shoreline Trail on the east bench to the Bonneville Shoreline Trail planned on the west bench. This trail link is also identified on the master plans of Bluffdale City and Salt Lake County. It is our understanding that a Single Point Interchange is planned at 14600 South, which we feel is not conducive to a multi-use trail use. We therefore recommend that the plans for the I-15 reconstruction include a separated safe trail crossing in the vicinity of the 14600 South Interchange. Currently, 14600 South and the east frontage roads are heavily used by commuter and recreational road bicyclist. The east frontage road serves as an important link between the two counties, while 14600 South serves as an important link between existing bicycle routes on both sides of I-15. These bike lanes are also identified on the Wasatch Front Regional Council's Bike Plan. We recommend that these streets accommodate bike lanes in each direction. The proposed multi-use trail parallel to the Utah Transit Authority railroad right of way and east frontage road at the Point of the Mountain will provide a link from the existing Porter Rockwell Trail, which currently extends north in Sandy City, to the proposed Murdock Canal Trail in Utah County, which is planned to the mouth of Provo Canyon. The trail is also identified on the master plans of Salt Lake County, Lehi City, and Mountainland Association of Governments. We recommend that any widening of I-15 and reconstruction of the east frontage road accommodates a safe trail corridor. We are aware of the request of the Draper City mayor and council regarding a road bridge crossing of I-15 at 13800 South. We also support this crossing, as it would also provide much needed pedestrian and bicycle access across the freeway in this area. We appreciate your consideration of our concerns and would be available for any further review and comment that you may need on this project.

Response: During the public comment period, members of the I-15 team met with officials from Draper and Bluffdale to discuss the comments raised in the Draper City letter. The team will continue to coordinate as design continues. As a result of the meeting, a proposed trail crossing has been developed south of the reconstructed 14600 South interchange. The current design concept for the east frontage road at the Point of the Mountain includes accommodations for the proposed trail. Further coordination will be needed between UDOT and Draper City regarding the proposed trail as the design progresses. It is anticipated that the desired roadway crossing at 13800 South would be over I-15. Because the proposed crossing would be over I-15 it will not be included as part of this study, as it can be built independently of the I-15 project.

D.3.5 Orem City (January 10, 2008)

The City of Orem sent two letters, with the second adding further detail on the points summarized from the first letter, below. For full details of the Orem City comments, please refer to Section D.7.

Comment 1: Many of the I-15 over/under street crossings may not be wide enough to accommodate Orem City's desired future right-of-way widths as adopted by our City Council.

Response: All proposed crossings will be coordinated with Orem City to ensure that structures can accommodate roadway widths as adopted by the Orem City Council.

Comment 2: We would like to explore an overpass versus an underpass option with the proposed 1200 North roadway crossing.

Response: Preliminary design concepts have identified the proposed crossing at 1200 North as crossing over a lowered I-15. UDOT will coordinate with Orem city as the design progresses.

Comment 3: We support full sound walls along the I-15 corridor AND the frontage roads.

Response: Comment noted.

Comment 4: We support Alternative 4, Option A (800 South Interchange and Frontage Road System). However, we would like a slip ramp to UVSC crossing under University Parkway connecting to the southern end of the campus drive.

Response: Option A in the Provo/Orem area is no longer part of the Preferred Alternative.

Comment 5: The new 800 South Interchange alignment west of I-15 needs to be shifted further north in order to provide additional parking stalls for the proposed Intermodal Center.

Response: See response to UTA Comment 8.

Comment 6: We request that UDOT provide a relocated railroad crossing for access to the properties along 800 South between the railroad tracks and the west side of I-15 corridor. We would like the relocated crossing to connect at the northern portion of the proposed Intermodal Center site.

Response: Design concepts will be closely coordinated with Orem City and UTA as the design progresses, to ensure roadway design solutions provide for placement of roadway structural elements and rail crossing devices are adequate for planned future rail transit operations.

Comment 7: We have concerns about the skewed angle of the proposed 1200 West realignment at Center Street, the new residential street connections south of Center Street on 1200 West, and the alignment of Center Street west of I-15. We would like to explore a more southern alignment shift of Center Street west of I-15 so the northern properties, including but not limited to 231, 156 and 108, are less impacted by the reconstruction of the interchange.

Response: The most current design concept at Center Street and the realigned 1200 West intersection has a reduced skew. The alignment of Center Street west of I-15 has been shifted further south to reduce impacts and the potential relocation of several businesses.

Comment 8: We have concerns about the 2000 South connections with the proposed frontage road system being too close to the two existing at-grade railroad crossings west of I-15. We would like to explore grade separated railroad crossing options with UDOT.

Response: This comment refers to designs that are no longer part of the Preferred Alternative.

Comment: 9: We would like UDOT to reconsider the location of the frontage road access point on Sandhill Road by possibly moving it further to the north.

Response: This comment refers to designs that are no longer part of the Preferred Alternative.

Comment 10: Please clarify the future 2030 traffic volumes for Alternative 1 (No-Build) and Alternative 4, Options A, B, C, and D that are presented in Chapter 2, Sections 2.4 and 2.5. It also appears that future 2030 traffic volumes for Sandhill Road are missing from the report. Please provide future 2030 Alternative 1 (No-Build) and Alternative 4, Options A, B, C and D traffic volumes for Sandhill Road from 1740 North to University Parkway.

Response: Between the DEIS and the FEIS, traffic modeling was updated to Version 6.0 of the WFRC/MAG model, and Chapter 2 has been updated. Volumes for Sandhill Road were not provided, because those data were not included in the traffic analysis. UDOT will continue to work with Orem City through subsequent phases of the project.

D.3.6 Lehi City (January 8, 2008)

Upon review of the I-15 Draft Environmental Impact Statement ("DEIS"), the Mayor and Council of Lehi City would like to submit the following comments and recommendations for your consideration. We recognize that with the reconstruction of I-15 there is an opportunity to improve access and mobility across the freeway at various locations in our community. While we are supportive of Alternative 4, we would like to make the following recommendations with respect to the following issues as they relate to future reconstruction and improvements of I-15 as anticipated in the I-15 DEIS Study. We believe they will add necessary attributes and improvements to Alternative 4 and must be included:

Comment 1: We recommend a new underpass be constructed at 2300 W. This would allow 2300 W to continue north of I-15 and connect to 3200 N and eventually SR-92 and would facilitate north south movement in the area without channeling traffic through the SR-92 or 1200 W freeway interchanges. This proposed underpass is not shown on our current Lehi City Master Transportation Plan, but was an idea that was brought up in the January 2007 Transportation Summit that was held at MAG.

> Response: Since the proposed crossing does not meet the purpose and need of this particular project, it will not be constructed with this project. UDOT recommends that the crossing goes over I-15, and is studied as part of the 2300 West environmental document.

Comment 2: The DEIS shows the construction of a new interchange in north Lehi, north of the existing SR-92 interchange. We support an interchange in this vicinity, but believe this new interchange would function best at 4800 N, with a separate underpass at the future Frank Ghery project site, because it would allow better spacing between the existing SR-92 interchange and the new interchange. Therefore, we recommend that a new underpass be added in conjunction with this new interchange.

> Response: An interchange at 4800 North is not a part of this project. The I-15 team will coordinate with the Mountain View Corridor Project regarding any potential interchange.

Comment 3: We recommend that the following existing I-15 crossings be widened/expanded as follows, as per the current adopted Lehi City Master Transportation Plan:

- 600 E overpass needs to be widened to accommodate our master planned road size of 600 E of 40 feet of asphalt with 6 foot sidewalks.
- 100 E underpass needs to be widened to accommodate our master planned road size for 100 E of 38 feet of asphalt and 32 foot overall ROW width.
- 300 W underpass needs to be widened to accommodate our master planned road size for 300 W of 48 feet of asphalt and 70 foot overall ROW width.

> Response: All proposed crossings will be built to accommodate roadway widths as identified in Lehi City's Master Transportation Plan.

Comment 4: We recommend a new pedestrian underpass where I-15 crosses Dry Creek that would accommodate a 10 foot wide trail and the stream channel. The City has a Master Planned trail and linear park system along Dry Creek. An underpass would allow the trail to continue along the creek without major rerouting along surface streets to get across I-15 and would preserve a critical link for the linear park system from east to west across I-15. In order for the pedestrian underpass to be usable and safe, we recommend that the total width of the underpass structure, including the area for the trail and the stream channel, be at least 30 feet wide.

> Response: The Preferred Alternative includes the accommodation of a proposed pedestrian crossing at Dry Creek. Lehi City will be responsible for construction of the trail leading up to the proposed crossing. Coordination will take place between UDOT and Lehi City as the design progresses.

Comment 5: The Utah County trail master plan recommends a trail crossing of I-15 to connect the Murdock Canal Trail to the Jordan River Parkway somewhere north of SR-92 (final location has not been determined).

Response: UDOT has proposed a grade separated trail crossing south of the 14600 South interchange in Draper City that will connect to the trail network.

Comment 6: Lehi City and MAG are planning for a regional trail (Historic Southern Rail Trail) along the rail corridor owned by UTA. This 10 foot wide asphalt trail is currently being planned from the Lehi/American Fork boundary to the point of the mountain where it will continue north into Salt Lake County. A study is currently underway for the environmental and preliminary design of this trail. In order to accommodate this 10 foot wide trail, we recommend the existing I-15 underpass at US-89 be widened. This trail also needs to be considered with the widening of I-15 and reconstruction of the east frontage road at the point of the mountain to allow a safe trail corridor.

Response: UDOT's current design concept accommodates the proposed trail along a portion of the east frontage road where the east frontage road is proposed to be relocated as a result of the widening of I-15 at the point of the mountain. UDOT will coordinate with UTA, Lehi City, Draper City and MAG as the design progresses.

Comment 7: Despite the reference to the "planned" Mountain View Corridor on page 2-39, which is premature, the interchange located at 2100 N should be sized to accommodate traffic only from a primary arterial, per the Lehi City Transportation Master Plan. It should be noted that most of the information above regarding under and overpass structures was included in memos sent by our City Staff to the I-15 EIS team on March 29, 2007 and again on October 31, 2007.

Response: Comment noted

Comment 8: With respect to the East-West Connector road in Lehi that will tie into I-15 at the American Fork Main Street interchange, we recommend that the width of the East-West Connector be expanded to a six travel-lane section from I-15 to 300 E. There are several other arterial and collector class roads that will be feeding into the East-West connector between 300 E and I-15 including 700 S, 1900S and 850 E. It is our opinion that these connecting roadways will generate a significant additional amount of traffic volume on the East-West Connector, and that a wider six travel-lane section through this area will be needed.

Response: UDOT's current design concepts include a 6-lane section between I-15 and 300 East.

Comment 9: The draft EIS shows three alternatives for the American Fork Main Street interchange. It is our opinion that if the environmental conditions that exist with option B are able to be resolved, it would be the best option (this option shows the East-West Connector Road extending straight east into American Fork on 200 S and connecting into a SPUI with combined railroad overpass structure adjacent to the SPUI).

Response: The Preferred Alternative in this area includes Option C. It has been refined since the DEIS to reduce environmental impacts.

Comment 10: The City has been working with UDOT on a possible location for the Mountain View Corridor to connect to I-15 at 4800 N. The City strongly supports this option, but there would need to be a separate underpass installed somewhere south of the 4800 N interchange as we have noted previously in our comments above. This new underpass would be needed to support local traffic between the Traverse Mountain and Frank Ghery projects and the west side of the freeway and also to provide for a trail connection from the Murdock Canal Trail to the Jordan River Parkway.

Response: Comment noted.

Thank you for allowing us an opportunity to comment on the draft I-15 EIS Study. We recognize the significance and need for the widening and other improvements that are planned for the I-15 corridor, and appreciate the efforts of the I-15 EIS team to move this project forward. Sincerely, Mayor Howard H. Johnson.

D.3.7 Provo City (December 13, 2007)

Lewis K. Billings, Mayor George O. Stewart, Municipal Council Chair Provo City Corporation

Re: Comments from the Provo City Administration and Municipal Council regarding proposed Widening of I-15 through Provo City Limits.

Gentlemen: During the last several months, Provo City has taken the opportunity to carefully review the alternatives proposed for improving capacity and function of I-15 through Utah County and more specifically through the boundaries of our City. In our estimation, the Project Design Team has done an excellent job in coordinating not only the state-wide needs and issues, but also the needs of the various local jurisdictions along the affected corridor. The website provided by project planners was especially useful and helpful as we sought to understand and evaluate the various proposals. The time project planners were willing to spend with us in responding to our questions and issues was also most helpful and appreciated.

I-15 has been a significant transportation corridor and benefit to all of the cities in Utah County for the past 50 years, but has also created a significant barrier for transportation access to both sides of those cities divided when it was constructed. In order to provide for City traffic circulation in the future and to accommodate the continuing increases in traffic volumes and congestion, the following items are a necessity for the plan to be successful:

Comment 1: FRONTAGE ROAD SYSTEM – We feel that the frontage road concept is extremely important in aiding and expediting traffic, not only onto the Interstate north and south, but to help facilitate east and west traffic movement in the City. With the connection of our collector and arterial roads to the frontage road system, we will be provided with quicker and more efficient access to underpasses along the freeway. We feel the frontage road system will provide more immediate access to many residential neighborhoods along its frontage with our boundaries and eliminate much of the cross traffic that is currently traversing our cities north and south to a very limited number of interchanges. It will also eliminate traffic that uses the I-15 corridor now as a collector, thus congesting the main line. This will aid in dispersing our traffic to the Interstate without unduly concentrating it in sensitive areas. We strongly urge the adoption of the "Frontage Road System." We would have preferred the Frontage Road System to continue through the University Avenue Interchange, but we recognize the significant expense that would involve through encroachment into adjacent developments along this section. The 500 West Underpass will help alleviate some of this need which will be addressed later in this review.

> Response: The Joint Lead Agencies have selected a Preferred Alternative that includes Option D in the Provo/Orem area. This does not include frontage roads. Options A and B, which do include frontage roads, present the most environmental impacts. Please see the comments from the United States Army Corps of Engineers and the Environmental Protection Agency, and the responses, in Section D.1.1 and D.1.2

Comment 2: CENTER STREET INTERCHANGE – We feel that a Single Point Urban Interchange will be necessary for an efficient transfer of transportation between I-15 and our City road network. The current design for the Single Point Urban Interchange as shown on the plans will not accomplish this goal. The SPUI as shown has three signalized intersections which will be very difficult to coordinate and cause additional future unneeded congestion. We would like to see the frontage road concept taken through the interchange with either braided ramps or some other means in order to eliminate two of the signalized intersections. We have noted the comment on Option B that indicates further design will need to be done on this interchange and we support this effort.

> Response: The frontage road concept is not part of the Preferred Alternative (see response to Provo Comment 1). Although the Preferred does include a SPUI, the three signalized intersections are no longer being considered.

Comment 3: CENTER STREET VIADUCT REPLACEMENT – As shown on all of the interchange drawings, the Center Street Viaduct will be replaced and significantly widened. This viaduct needs to be replaced as shown. Our

opinion is that this facility should be increased to a seven lane design in order to accommodate the east-west flow that currently exists today and to meet future growth on the west side including the airport.

Response: The Center Street Viaduct will be replaced with I-15 Widening and Reconstruction. At this time, design shows seven lanes (six-lanes and a median).

Comment 4: 500 WEST UNDERPASS – The 500 West Underpass is needed to accommodate our restricted east-west flow. When I-15 is widened it is likely that the existing frontage road, on the west side, will be narrowed or eliminated. 500 West must connect both sides that have been separated since the original construction I-15 in the 1960's. We fully support this concept and commend the I-15 Team for their consideration.

Response: An underpass at 500 West in Provo is a part of the Preferred Alternative.

Comment 5: UNIVERSITY AVENUE INTERCHANGE (WESTERN LEG) – As the I-15 Design Team is aware, Provo City's and MAG's long-range plan include a highway from the University Avenue Interchange to the Provo City Airport. This highway will intercept five or six collector and arterial roads on our west side. We recognize that the environmental issues are being addressed in a separate Environmental Impact Statement for the Westside Connector, but emphasize that when this study is completed and assuming the preferred option could be a connection to the University Avenue Interchange, Provo would like this connection included in your plans as final design and funding are arranged for I-15.

Response: UDOT will coordinate final design with all other appropriate projects.

Comment 6: REALIGNMENT OF 820 NORTH INTERSECTION GENEVA ROAD – In order to provide Frontage Road access with reasonable grades over the railroad north of 820 North it was determined by the Design Team that the 820 North connection needs to be relocated with an 'S' Bend connecting to 620 North at Geneva Road rather than the current 820 North at Geneva Road. The 820 North Underpass will be eliminated. The 820 North alignment at Geneva Road is undesirable for an intersection and we commend the Design Team for their approach since the west leg of that intersection goes directly into a residential local road. In addition to providing frontage road access and reasonable grades over the railroad, this also connects two important arterial roads on our master Plan for much better traffic circulation. Provo City supports this concept and would like to see it continue through the final development of the project.

Response: The re-alignment of 820 North has been included in the Preferred Alternative.

IN SUMMARY – As we have evaluated the four options that have been presented to this point in the Draft Environmental Impact Statement, Provo City's preference is Option B which includes the "Frontage Road," the Center Street Viaduct replacement and widening, the SPUI at Center Street and I-15, the 500 West Underpass under I-15, and the relocation of 820 North Geneva Road Intersection to 620 North with the following exceptions. The Single Point Urban Interchange that is currently conceptual only, needs to be redesigned to accommodate a single signalized intersection without the signalized intersections as shown where the frontage roads join. A notation on the drawings that indicates at University Avenue Interchange, a west leg to the Airport is currently being studied and if a viable and acceptable environmental alternative is chosen, it will be included in the I-15 plan during final design and construction. Also we feel that the Center Street Viaduct in its current five-lane concept will be inadequate for our future needs and recommend that a seven-lane alternative be adopted. We commend the I-15 Design Team for their immense efforts in putting together a very comprehensive study of the needs and impact to the Utah County area and Provo City specifically. We have appreciated your willingness to include our needs and interconnections through this process. We look forward to an efficient and well designed I-15 Corridor through our County, recognizing this as the most important corridor in our region. Sincerely yours, PROVO CITY CORPORATION Lewis K. Billings, Mayor George O. Stewart, Municipal Council Chair

D.3.8 *American Fork Public Works (January 8, 2008)*

Recently, in conjunction with the I-15 reconstruction Environmental Impact Statement, the City of American Fork contracted Hales Engineering to provide a traffic study and recommendations for the West Main Street Interchange. In the process of that review, Hales Engineering identified the forecasted traffic for the interchange within the 20-year design window of 45,000 vehicles per day as per information provided by Parsons Brinkerhoff (PB). The City acknowledges that the Interstate and Interchange system fall under the purview of the Utah Department of Transportation; however, as the interchange will greatly affect the function of the adjacent City streets within the blossoming commercial areas. The City is concerned that the traffic congestion on the interchange not cause the intersections on the adjacent City streets to lapse into failure. As such, below are a few points that we would like to discuss further with UDOT relative to the interchange as the designs continue to progress.

- Adequate lane configuration crossing the interchange: It appears from the concept drawings in the EIS that there are only two through lanes in each direction across the interchange. It is our understanding from our traffic consultants that to pass 45,000 vehicles per day at al Level of Service 'D' a configuration with three through lanes in each direction will be required. Previously the City's understanding has been that the section would include 7 travel lanes.
- Adequate turning pockets and ramp metering queues: We recognize that this level of examination may not have been completed at this point; however, we would like to ensure that the anticipated peak hour queues in the interchange traffic do not extend into the adjacent City intersections.
- Vineyard Connector: It is our understanding that Vineyard Connector traffic is not included in the 45,000 VPD that has been modeled for the I-15 project. We understand the current project volumes of the Vineyard Connector to be 30,000 ~ 40,000 VPD. We have some concern in regards to the effect of this additional traffic burden on the level of service of the interchange.
- Signalization of the adjacent City Streets and the Front Runner access road: We would like to discuss the anticipated signalization of the adjacent City streets and other UDOT access management restrictions in the area to allow us to adequately plan the City facilities and to correctly direct development in the area.
- ITS Interconnect: We assume that the new signals will be incorporated into the existing UDOT sponsored signal interconnect system that is in place within the city.

We recognize the immense effort that a reconstruction plan with the magnitude of I-15 represents an praise UDOT's efforts in keeping the communities involved in the decision making process. Thank you for all your help and co-operation with the City. We look forward to continue working together toward successful transportation solutions. Please contact us if you have any questions about our comments.

> Response: On March 11, 2008, UDOT met with American Fork City and American Fork City Public Works officials to discuss the Main Street interchange and the comments raised in their letter. During the meeting, participants discussed traffic volumes, lane configuration and other design issues. UDOT continues to coordinate with American Fork on these issues.

D.4 Municipal Planning Organizations

D.4.1 Mountainland Metropolitan Planning Organization (December 18, 2007)

RE: Mountainland Metropolitan Planning Organization Official Comment on the I-15 Corridor

To Whom It May Concern: Please accept this letter as the Mountainland Metropolitan Planning Organization's (MMPO) official comment on the I-15 Corridor Draft Environmental Impact Statement. We feel it is important to assure that the final alignment meets the Purpose and Need of the study.

Comment 1: The reconstruction of I-15 is consistent with the Mountainland Metropolitan Planning Organization's Regional Transportation Plan (RTP).

Response: Comment noted

Comment 2: The MMPO supports Provo City's request to have a Single-Point Urban Interchange built at Center Street and I-15.

Response: Comment noted.

Comment 3: The MMPO also requests a design for the Orem 800 South interchange that reduces the impact on developable land near the inter-modal center on the west side of I-15.

Response: The Preferred Alternative through the Provo/Orem area includes Option D, which includes a flyover at University Parkway, and a roundabout. Please see responses to UTA Comment 8 and Orem Comment 5.

Comment 4: Additionally, the MMPO encourages full cooperation with American Fork City in the design of the Main Street interchange to ensure compatibility with the City's General Plan.

Response: UDOT and the I-15 team will continue to coordinate with American Fork. The design presented in Option C is a direct result of past coordination.

As always, the MMPO will support the final alignment as identified by the Federal Highway Administration in the Final Environmental Impact Statement and will amend our RTP if need. Thank you for the opportunity to comment. Sincerely, Mayor Jerry Washburn, Chair, Regional Planning Committee, Mountainland Metropolitan Planning Organization

D.4.2 Wasatch Front Regional Council (January 11, 2008)

Comment 1: The 1-hour ozone standard was revoked in June of 2005. SL County was formerly a non-attainment area under the 1-hour ozone standard. SL and UT counties have always been in attainment of the current 8-hour ozone standard. A revision to the 8-hour standard has been proposed but it is not yet in place and there is still some uncertainty what the standard will be. It is appropriate to address ozone in the EIS since it will still be an issue for air quality, but the discussion should be in the context of the proposed standard revision not the old 1-hour standard that no longer applies or the current 8-hour standard which is being attained. Table 3.8-2 should be revised to show that SL County is in an attainment area for the current ozone standard.

Response: Correction was made in Table 3.8-1 regarding ozone attainment status. Text was added to Section 3.8.1.3 to discuss the implications of the upcoming revision of the ozone NAAQS and the possible re-designation to an ozone nonattainment area.

Comment 2: A new standard for $PM_{2.5}$ is in effect and this should be addressed in all sections of the air quality discussion along with the various other criteria pollutants that are addressed. EPA final designations have yet to be made but all indications are that the Wasatch Front counties will be non-attainment for $PM_{2.5}$ at the new 35ug/m3 standard. Where $PM_{2.5}$ is addressed it would be helpful to give these sections a separate heading or section number as appropriate rather than combining $PM_{2.5}$ with the PM_{10} discussion. This will assist reviewers who might otherwise mistakenly conclude that $PM_{2.5}$ was not addressed.

Response: Discussions of regional $PM_{2.5}$ impacts and localized PM2.5 hot-spots have been placed into header sections dedicated to $PM_{2.5}$. These Sections are included under 3.8.5.1 and 3.8.5.4.

Comment 3: The most recent WFRC conformity analysis was prepared in 2007 and is available on the website. There are a number of citations to WFRC's 2006 conformity analysis. The EIS should reflect the more recent date and the latest data from the 2007 analysis.

Response: The document was revised to refer to the most recent 2007 analysis.

D.5 Public Comment

Over 470 comments were received and are presented in the spreadsheet below. Some common comments can be addressed here.

D.5.1 Comments on Frontage Roads in Provo/Orem

Most of the comments received during the public comment period concerned frontage roads. Federal agencies made comments, discussed above. During the public comment period, Kay Van Buren, a Chairperson for the Grandview Hill Neighborhood association in Provo, expressed concern over the Provo/Orem options that include frontage roads (Options A and B). At Grandview's request, members of the I-15 team attended a neighborhood meeting at Westridge Elementary School on January 9th, 2008, to describe and explain the four options in the Provo/Orem area, and to answer any questions resident's might raise.

Response: UDOT has decided to proceed in preparing the FEIS with 'Option D' as the Preferred Option in the Provo/Orem area. 'Option D' consists of a flyover for the I-15 southbound exit to University Parkway eastbound, a direct connection to UVSC from the I-15 northbound exit at University Parkway, and total reconstruction of the Provo Center Street interchange. 820 North in Provo will be re-aligned further south. The decision to select 'Option D' as the Preferred Option in the Provo/Orem area is based upon comments received from federal and state agencies, local governments, and the general public; and the needs along the I-15 Corridor, while minimizing environmental impacts. A detailed explanation and discussion of the impacts will be included in the FEIS. A final decision will not be made until approval of the FEIS and the Record of Decision (ROD) is signed by the Federal Highway Administration (FHWA).

D.5.2 Orem 800 South Interchange Comments

A number of public comments expressed concern over the proposed interchange at Orem 800 South. On the east side of I-15 these concerns included noise, traffic and visual impacts. A neighborhood meeting was held with citizens from the neighborhood on March 11, 2008. On the west side of the highway, comments addressed the proposed alignment of 800 South to Geneva Road.

Response: The Preferred Alternative does not include a new interchange at Orem 800 South. Therefore, there will be no re-alignment of 800 South to Geneva Road as a part of this project.

D.5.3 Sound/Noise Wall Comments

A number of individuals, especially in Spanish Fork and Provo/Orem, offered comment on sound walls.

Response: The noise analysis was re-run for the FEIS, and predicted 2030 impacts are shown in Volume II, with proposed mitigation. See Section 3.7 Noise for more information. UDOT's Noise Abatement Policy requires public and local government acceptance of each proposed noise barrier. Noise barriers will be further assessed during the design stage prior to construction. UDOT will contact the local municipality and impacted residents/landowners on both sides of the highway. If a sufficient number of affected residents/land-owners, as defined by the noise policy, vote in favor of noise walls they will be installed.

D.5.4 Orem 1200 West

Residents of the Deerfield subdivision in Orem expressed concern over the proposed re-alignment of 1200 West near Center Street. Their concerns focus on traffic bypassing Center Street through their neighborhood.

Response: Orem 1200 West has been re-designed since the DEIS, and the current design is presented in Volume II. The current design prevents access through the neighborhood. The final decision will have to be approved by the City of Orem.